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Attorney for Molded Fiber Glass Companies

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:)
) Case No. 09-50026 (REG)
) (Jointly Administered)
GENERAL MOTORS CORP., *et al.*)
) Chapter 11
Debtors.)
)

**LIMITED OBJECTION OF MOLDED FIBER GLASS COMPANIES TO NOTICE OF
(I) DEBTORS' INTENT TO ASSUME AND ASSIGN CERTAIN EXECUTORY
CONTRACTS, UNEXPIRED LEASES OF PERSONAL PROPERTY, AND UNEXPIRED
LEASES OF NONRESIDENTIAL REAL PROPERTY AND (II) CURE AMOUNTS
RELATED THERETO**

Molded Fiber Glass Companies ("MFG"), by and through its undersigned counsel, hereby submits its limited objection (the "Limited Objection") to the Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto (the "Notice").

In support of its Limited Objection, MFG states that on or about June 5, 2009, Debtors delivered the Notice to MFG indicating Debtors' intent to assume and assign certain of Debtors' agreements with MFG (the "MFG Assumed Contracts"). Debtors identify \$98,983.04 as the

proposed cure for the MFG Assumed Contracts (the "Proposed Cure Amount"). MFG has determined that the Proposed Cure Amount is less than the amount of prepetition defaults. Specifically, the Proposed Cure Amount does not include \$353,645.90 in additional prepetition defaults (the "Additional Cure Amount"). Attached as Exhibits A through F are invoices showing the Additional Cure Amount. MFG has no objection to the assumption and assignment of the MFG Assumed Contracts so long as the Additional Cure Amount is similarly paid.

WHEREFORE, MFG respectfully requests that the Court enter an Order compelling Debtors to increase the Proposed Cure Amount for the MFG Assumed Contracts to \$452,628.94.

DATED: June 15, 2009

Respectfully submitted,

/s/ Jeffrey L. Coxon

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Objection was served this 15th day of June, 2009, electronically via the Court's CM/ECF System on the parties registered thereto, and upon the following parties by properly addressed overnight mail:

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/s/ Jeffrey L. Coxon
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